

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Chapter 11

In re :
DELPHI CORPORATION, et al. : Case No. 05-44481 (RDD)
Debtor : Jointly Administered

REPLY OF CREDITOR F&G TOOL AND DIE CO. INC. TO DEBTORS' OMNIBUS
OBJECTION PURSUANT TO CONFIRMATION ORDER, 11 U.S.C. §§105(a), AND
FED. R. BANKR. P. 9014 REGARDING CURE PROPOSALS SUBMITTED UNDER
ARTICLE 8.2(b) OF DEBTORS' PLAN OF REORGANIZATION (AS TO F&G TOOL
AND DIE CO. INC.)(DOC. 13459)

Now comes Creditor F&G Tool and Die Co. Inc. ("F&G Tool") and hereby objects to the cure amount proposed by Debtors as set forth in Exhibit C of Debtors' Omnibus Objection Pursuant to Confirmation Order, 11 U.S.C. §§105(a) and Fed. R. Bankr. P. 9014 Regarding Cure Proposals Submitted Under 8.2(b) of Debtors' Plan of Reorganization (Doc. 13459), for the following reasons:

1. Debtors have proposed to cure certain executory contracts for a total of \$0.00 as specified in Exhibit C to the above referenced pleading.
2. The correct cure amount is \$145,739.73 as itemized in the exhibit attached hereto and incorporated herein.

3. The executory contracts/purchase orders at issue are as follows:

PO No. 550041831	\$65,001.20
PO No. 550047007	\$ 75.00
PO No. 550060396	\$74,863.11
PO No. 550069859	\$ <u>5,800.42</u>
TOTAL	\$145,739.73

WHEREFORE, F&G Tool objects to the proposed cure of \$145,739.73 and proposes a cure amount of \$155,121.83 as set forth above.

Respectfully submitted,

/s/Paul H. Spaeth

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CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that a true and accurate copy of the foregoing Objection of Creditor F&G Tool and Die Co. Inc. to Debtors' Omnibus Objection Pursuant to Confirmation Order, 11 U.S.C. §§105(a), and Fed. R Bankr. P. 9014 Regarding Cure Proposals Submitted Under Article 8.2(b) of Debtors' Plan of Reorganization (as to F&G Tool and Die Co. Inc.) was served electronically through the Court's electronic transmission facilities upon those parties receiving such service in this case and by ordinary United States mail service this 16th day of May, 2008 upon the following:

Honorable Robert D. Drain
United States Bankruptcy Judge
United States Bankruptcy Court
for the Southern District of New York
One Bowling Green, Room 632
New York, New York 10004

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/s/Paul H. Spaeth
Paul H. Spaeth